

William L. Needler  
William L. Needler and Associates  
555 Skokie Blvd Ste 500  
Northbrook, IL 60062  
(847) 559-8330 ph  
(847) 559-8331 fax  
Bar ID 02025248  
E-Mail: WilliamLNeedler@aol.com

Attorneys for the Debtor  
Incredible Auto Sales LLC

Clarke B. Rice  
Clarke B. Rice P.C.  
2951 King Avenue West  
Billings, Montana 59102  
(406) 254-2500 ofc phone  
(406) 294-2525 fax  
Montana ID # 1289  
E-Mail: CLarkerice@imt.net

Co-Counsel for the Debtor  
Incredible Auto Sales LLC

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

**IN RE:**

INCREDIBLE AUTO SALES L.L.C.

Debtor

Case No. 06-60855-RBK

Judge Ralph B Kirscher

A Chapter 11 Proceedings  
For Reorganization

**RESPONSE, LIMITED RESISTANCE AND OBJECTION TO G.E. COMMERCIAL  
FINANCE CORPORATION (HEREINAFTER "GE")**

NOW COMES the Debtor, Incredible auto Sales L.L.C., by and through its  
Attorneys and Responds and herein files this Debtor's Limited Resistance and  
Objection to the GE Motion for Relief.

The Debtor states as follows:

- 1.) This case was filed as a Chapter 11 on 10/17/06.
- 2.) At the time of filing, this Debtor had various vehicles on hand at its premises covered by liens to Hyundai Motor Financial and various boats and motors subject to lien of movant herein GE Commercial Distribution Finance Corp. (GE).
- 3.) The list of inventory on hand and subject to this Motion is as follows:

Boats	Model	Serial Number
	14 AVENGER	BUJ18475J304
	GENERIC 1232	BUJ22092K304
	GV12/V1264	BUJ23496L304
	HAWK 186 SPT	BUJ28288A404
	14 AVENGER	BUJ35781D404
Motors		
	40EL	0T827250
	9.9M	0T924009
	115E	0T932614
	25EL	0T953777

- 4.) The Debtor is primarily an Automobile Dealer and will consent to a relief and return of these above assets so long as GE:
  - (1.) Waives any and all claims against the Debtor; and
  - (2.) Picks up merchandise at a pre-arranged time.

WHEREFORE the Debtor consents to stay relief provided it receives full release as set forth and as Order of Court as to this disposition.

/s/ William L. Needler  
Attorney for  
Incredible Auto Sales L.L.C

William L. Needler  
William L. Needler and Associates  
555 Skokie Blvd Ste 500  
Northbrook, IL 60062  
(847) 559-8330 ph  
(847) 559-8331 fax  
Bar ID 02025248  
E-Mail: WilliamLNeedler@aol.com

Attorneys for the Debtor  
Incredible Auto Sales LLC

Clarke B. Rice  
Clarke B. Rice P.C.  
2951 King Avenue West  
Billings, Montana 59102  
(406) 254-2500 ofc phone  
(406) 294-2525 fax  
Montana ID # 1289  
E-Mail: CLarkerice@imt.net

Co-Counsel for the Debtor  
Incredible Auto Sales LLC

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

**IN RE:**

INCREDIBLE AUTO SALES L.L.C.

Debtor

Case No. 06-60855-RBK

Judge Ralph B Kirscher

A Chapter 11 Proceedings  
For Reorganization

**NOTICE OF RESPONSE**

PLEASE TAKE NOTICE, that on December 15, 2006 that the attached  
RESPONSE, LIMITED RESISTANCE AND OBJECTION TO G.E. COMMERCIAL  
FINANCE CORPORATION (HEREINAFTER "GE") was filed with the United States

Bankruptcy Court for the District of Montana, 400 North Main Street, 2<sup>nd</sup> Floor, Butte, Montana. (A copy of the Objection and Notice are attached.)

/s/ William L. Needler  
William L. Needler  
William L. Needler and Associates  
555 Skokie Blvd.  
Suite 500  
Northbrook, IL 60062  
Bar ID# 2025248  
(847) 559-8330  
(847) 559-8331 - FAX

### **PROOF OF SERVICE**

William L. Needler, an attorney, certifies that he filed this Objection on December 15, 2006 with the Clerk of the above Court via CM/ECF electronic filing and the persons listed by the Court were served electronically.

CHRISTOPHER P BIRKLE lovellaw@hotmail.com  
ALAN C. BRYAN abryan@crowleylaw.com  
SHANE P. COLEMAN spcoleman@hollandhart.com,  
bbowler@hollandhart.com;vhenry@hollandhart.com;intaketeam@hollandhart.com  
BRUCE F. FAIN bruce@murphkirk.com, pam@murphkirk.com;amy@murphkirk.com  
CHARLES W. HINGLE chingle@hollandhart.com,  
bbowler@hollandhart.com,mhauck@hollandhart.com,jritchie@hollandhart.com,pmoritz@hollandhart.com  
,lsawatzke@hollandhart.com  
DOUG JAMES james@moultonlawfirm.com, smarble@moultonlawfirm.com  
NEAL G. JENSEN Neal.G.Jensen@usdoj.gov  
WILLIAM L NEEDLER williamlneedler@aol.com  
OFFICE OF THE U.S. TRUSTEE ustpregion18.gf.ecf@usdoj.gov  
JAMES A. PATTEN japatten@ppbglaw.com, aschueler@ppbglaw.com;ESchoemer@ppbglaw.com

This Attorney also certifies that he also caused to be served, a copy of the above Objection and Notice as attached hereto, to the persons listed below served by Facsimile Service from the Attorneys offices on December 15, 2005.

/s/ William L. Needler  
William L. Needler

Incredible Auto Sales  
Ken Cornelison  
1832 King Avenue West  
Billings, MT 59102  
(406) 652-3297 new fax

Clarke B Rice  
2951 King Avenue West  
Billings, MT 59102  
(406) 294-2525 fax